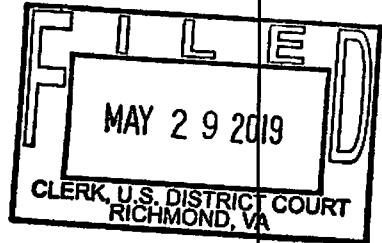


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



ROBERT DAVID STEELE, et al...

Case No.: 3:17-cv-00601-MHL

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

DEFENDANT'S RESPONSE TO
PLAINTIFF, ROBERT DAVID STEELE'S,
FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS AND MOTION TO STAY
DISCOVERY

**DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S,
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY
DISCOVERY**

Comes now Defendant Jason Goodman, Pro Se, with his response to Plaintiff's request for production of documents to move this court to stay discovery. The information Plaintiff requests would subject Defendant to undue annoyance, embarrassment, burden and expense without providing proportional value in resolving this matter. It is Defendant's belief that Plaintiff has endeavored to intentionally annoy, embarrass, harass and unduly burden Defendant while causing great expense of time, money and recourses not only for the Defendant, but also this honorable court. This request for document production is a furtherance of that effort.

The scope of Plaintiff's request is broad. If granted at all, it should be limited to matters of legitimate interest in resolving claims and requires a balancing of the probative value of the information sought with the burden placed upon the respondent. Defendant objects to Plaintiff's first request for discovery because it grossly violates this standard.

DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY - 1

1 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.
2 Further, I hereby attest that the attached exhibits are accurate and true copies of source
3 documents as described. Video and telephone recording transcripts may contain typos due to
4 voice to text transcription software. True and accurate copies of original video and audio
5 recordings can be provided should it please the court.
6

7 Signed this 28 day of May 2019
8
9

10 Defendant, Pro Se Jason Goodman
11
12



13 Jason Goodman, Pro Se
14 252 7th Avenue Apt 6s
15 New York, NY 10001
16 truth@crowdsourcethetruth.org
17
18
19
20
21
22
23
24
25
26
27
28

DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY - 2

BACKGROUND INFORMATION

Defendant Goodman has alleged a conspiracy between Plaintiff, Intervenor Applicant, co-Defendant Lutzke/Holmes and numerous third parties. This conspiracy is intended to disrupt, defund, defame, embarrass and otherwise frustrate the Defendant in an effort to chill Defendant's journalistic efforts. The conspiracy has been publicly acknowledged by Intervenor Applicant in a multiparty call, broadcast on YouTube as indicated by Defendant in previous pleadings (ECF No 78 EXHIBIT A). Any information gleaned from this instant legal action would almost assuredly be used to continue this effort.

Despite the entry of a default judgement against co-Defendant Susan Lutzke/Holmes in September of 2018, Plaintiff did nothing to prosecute this matter for more than six months. Only after D. George Sweigert began entering declarations and then attempting to intervene, did Plaintiff move to begin the Discovery process. The sheer number of motions and filings coming from both Plaintiff and Intervenor Applicant could be interpreted as intended to overwhelm Defendant in a compounded, cooperative, seemingly coordinated manner.

This instant lawsuit is an attempt to overwhelm Defendant, not with facts or valid claims of injury seeking relief, but rather lengthy pleadings based on false claims and false statements with no basis in fact or law and no evidence. The demand for production of documents will serve no benefit in resolving Plaintiff's false claims it is merely an intelligence gathering attempt by Plaintiff, intended to further Plaintiff's efforts to harass and intimidate the Defendant.

Plaintiff has failed to make a claim for which relief can be granted. Plaintiff will fail to prove defamation because he cannot prove Defendant made known false statements. In fact, Defendant remains consistent in his belief that the statements are true and correct. Plaintiff is a limited purpose public figure, certainly to the same extent Defendant is, having participated in DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY - 3

1 many televised interviews and appearances around the world for several years prior to appearing
2 on Defendant's broadcast.

3 Plaintiff has publicly lied, claiming the very discovery process in question had already
4 provided him information that Defendant Goodman is paid \$3000 per month by Israeli Mossad.
5 This specific claim has been repeated by Intervenor Applicant and other co-conspirators as
6 pointed out in previous pleadings (ECF No 78 EXHIBIT I). This claim was made by Plaintiff in
7 a video on YouTube that has since been removed but is paraphrased in a similar blog post by
8 Plaintiff. (<https://ahtribune.com/culture-media/1992-deep-state-social-media.html>). In a blog
9 post titled Live-Streamed Defamation, Plaintiff claims "*On 13 June I did a live-streamed*
10 *interview with George Webb, whom I respect very much. He was being "handled" at the time by*
11 *one Jason Goodman with Patricia Negron as his partner. In the course of that interview, [26] I*
12 *raised the prospect of Goodman himself being handled – perhaps unwittingly – by the Mossad. I*
13 *speculate now that legal discovery will reveal both monthly payments to Goodman on the order*
14 *of \$3,000 a month, and a pattern of email and cellular contacts suggestive that Goodman has*
15 *been taking direction, first toward undermining George Webb (who was getting too close to the*
16 *truth about the Awan brothers being patsies for a Mossad operation via Debbie Wasserman*
17 *Schultz, spying on and blackmailing Members of Congress) and then #UNRIG, Earth*
18 *Intelligence Network, and me. [27]"*

21 In the absence of true factual information, Plaintiff has fabricated a ludicrous story in one
22 of many malicious attempts to damage Defendant's worldwide reputation with false and
23 outrageous accusations. There is little doubt that any information obtained through discovery
24 would be used by Plaintiff to embarrass, harass, intimidate or otherwise harm Defendant further.

1 Plaintiff has brazenly requested privileged email communications with parties unrelated
2 to this legal matter who are journalistic sources. These sources identities and communications
3 with Defendant are protected by New York Civil Rights Law - CVR § 79-h. *Special provisions*
4 *relating to persons employed by, or connected with, news media.*
5

6

7 **RESPONSE TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

8 1. Goodman objects to this request because Goodman does not have sufficient financial
9 resources to pay the arbitrarily calculated absurdly high sum demanded by Plaintiff.
10 Examination of Goodman's financial records would not only be unduly burdensome
11 and oppressive it would not yield any useful evidence in resolving this matter.
12

13 2. There are no documents to produce in response to this request because Defendant has
14 not received any DONATIONS. This request further illustrates Plaintiff's inability to
15 distinguish between a charitable donation and a payment to a for profit business.
16 Defendant's news service provides video programming for its customers using a
17 totally different business model than traditional broadcasts. Since its inception,
18 broadcast news has been generally delivered to the end consumer, the viewer, at no
19 cost, in exchange for spending some amount of time viewing advertisements paid for
20 by multimillion-dollar sponsors of the broadcast. Defendant's for-profit business has
21 done away with corporate sponsors by selling micro sponsorships directly to viewers.
22 This approach eliminates the possibility of a single sponsor gaining financial
23 influence or sway over the news reporting and is part of Defendant's brand strategy.
24 Defendant's customers receive in kind for their payments, viewership of the video
25 broadcasts.
26

27
28 DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY - 5

1 3. Goodman objects to this request because it violates his First Amendment Rights.

2 Goodman is a pioneer on the cutting edge of crowdsource investigative journalism, a
3 new technique that combines traditional investigative journalism with social media.
4 Guests on Goodman's show are often whistleblowers exposing corruption, firsthand
5 witnesses to crime and expert witnesses providing relevant testimony. In this new
6 model of crowdsourced investigative journalism, the audience participates in the
7 investigation and even provides a pool of witnesses and confidential sources. The
8 Plaintiff's request to "identify members of the CSTT community" reveals their true
9 goal. Plaintiff wants to expose the identities of individuals who provide leads,
10 valuable evidence and first hand testimony so they too may be attacked, intimidated
11 or harassed with lawsuits or other means. Intervenor Applicant has exhibited a
12 pattern and practice of taking extra judicial measures to discourage guests from
13 appearing on Goodman's show, most recently writing a letter to the Department of
14 the Army after a retired Four-Star General appeared on the show to provide testimony
15 contradicting Plaintiff's claims. (**EXHIBIT A**) This extra judicial action is both
16 harassment of Defendant's associate and further circumstantial evidence of
17 cooperation between Plaintiff and Intervenor Applicant in an effort to succeed jointly
18 in this legal action. Plaintiff's request violates New York Civil Rights Law - CVR -B
19 79-h. Special provisions relating to persons employed by, or connected with, news
20 media which protects Goodman's right to keep journalistic sources' identities secret.

21 4. Defendant received no DONATIONS, therefore, there are no documents to produce
22 in response to this request.

1 5. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. Special provisions relating to persons
3 employed by, or connected with, news media which protects Goodman's right to
4 keep journalistic sources' identities and communications secret.
5

6 6. Goodman objects to this request because it violates his First Amendment Rights and
7 New York Civil Rights Law - CVR -§ 79-h. Special provisions relating to persons
8 employed by, or connected with, news media which protects Goodman's right to
9 keep journalistic sources' identities and communications secret.
10

11 7. Goodman objects to this request because it violates his First Amendment Rights and
12 New York Civil Rights Law - CVR -§ 79-h. Special provisions relating to persons
13 employed by, or connected with, news media which protects Goodman's right to
14 keep journalistic sources' identities and communications secret.
15

16 8. Goodman objects to this request because the Plaintiff has demonstrated that he
17 already has copies of all the videos in question. This request reveals yet another
18 attempt to unduly burden, oppress and cause expense for the Defendant without
19 yielding any useful evidence in resolving this matter. The only conceivable purpose
20 for making this request is to occupy Defendant with redundant busywork.
21

22 9. Goodman objects to this request because Plaintiff already has copies of the videos
23 and this request is written in a manner that serves to confuse. It is not clear what the
24 difference is between complete copies and electronic copies, given that these videos
25 originate in an electronic medium and live on-line. The Plaintiff's pleadings
26 including lengthy quotes, screen captured photo exhibits and statements attesting to as
27 much, indicate that Plaintiff has downloaded all of the videos in question. This
28

1 means Plaintiff already has COMPLETE copies. DIGITAL ELECTRONIC copies
2 are exact duplicates of the original data. This request reveals yet another attempt to
3 unduly burden, oppress and cause expense for the Defendant without yielding any
4 useful evidence in resolving this matter.
5

6 10. Goodman objects to this request because it would unduly burden, oppress and cause
7 expense for the Defendant without yielding any useful evidence in resolving this
8 matter. Goodman also objects to this request because it violates his First Amendment
9 Right to free speech and freedom of the press in its attempt to seek information about
10 the identities of journalistic sources and their information.
11

12 11. Goodman objects to this request because it violates his First Amendment Rights and
13 New York Civil Rights Law - CVR -B 79-h. which protects Goodman's right to keep
14 journalistic sources' identities and communications secret.
15

16 12. Goodman objects to this request because it violates his First Amendment Rights and
17 New York Civil Rights Law - CVR -B 79-h. which protects Goodman's right to keep
18 journalistic sources' identities and communications secret.
19

20 13. Goodman objects to this request because it violates his First Amendment Rights and
21 New York Civil Rights Law - CVR -B 79-h. which protects Goodman's right to keep
22 journalistic sources' identities and communications secret.
23

24 14. Goodman objects to this request because it violates his First Amendment Rights and
25 New York Civil Rights Law - CVR -B 79-h. which protects Goodman's right to keep
26 journalistic sources' identities and communications secret.
27

1 15. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.
4

5 16. Goodman objects to this request because it violates his First Amendment Rights and
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
7 journalistic sources' identities and communications secret.
8

9 17. Goodman objects to this request because it violates his First Amendment Rights and
10 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
11 journalistic sources' identities and communications secret.
12

13 18. Goodman objects to this request because it violates his First Amendment Rights and
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
15 journalistic sources' identities and communications secret.
16

17 19. Goodman objects to this request because it violates his First Amendment Rights and
18 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
19 journalistic sources' identities and communications secret.
20

21 20. Goodman objects to this request because it violates his First Amendment Rights and
22 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
23 journalistic sources' identities and communications secret.
24

25 21. Goodman objects to this request because it violates his First Amendment Rights and
26 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
27 journalistic sources' identities and communications secret.
28

1 22. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.

4 23. Goodman objects to this request because it violates his First Amendment Rights and
5 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
6 journalistic sources' identities and communications secret.

7 24. Goodman objects to this request because it violates his First Amendment Rights and
8 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
9 journalistic sources' identities and communications secret.

10 25. Goodman objects to this request because it violates his First Amendment Rights and
11 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
12 journalistic sources' identities and communications secret.

13 26. Goodman objects to this request because it violates his First Amendment Rights and
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
15 journalistic sources' identities and communications secret.

16 27. Goodman objects to this request because it violates his First Amendment Rights and
17 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
18 journalistic sources' identities and communications secret.

19 28. Goodman objects to this request because it violates his First Amendment Rights and
20 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
21 journalistic sources' identities and communications secret.

1 29. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.

4 30. Goodman objects to this request because it violates his First Amendment Rights and
5 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
6 journalistic sources' identities and communications secret.

7 31. Goodman objects to this request because it violates his First Amendment Rights and
8 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
9 journalistic sources' identities and communications secret.

10 32. Goodman objects to this request because it violates his First Amendment Rights and
11 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
12 journalistic sources' identities and communications secret.

13 33. Goodman objects to this request because it violates his First Amendment Rights and
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
15 journalistic sources' identities and communications secret.

16 34. Goodman objects to this request because it violates his First Amendment Rights and
17 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
18 journalistic sources' identities and communications secret.

19 35. Goodman objects to this request because it violates his First Amendment Rights and
20 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
21 journalistic sources' identities and communications secret.

1 36. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.

4 37. Goodman objects to this request because it violates his First Amendment Rights and
5 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
6 journalistic sources' identities and communications secret.

7 38. Goodman objects to this request because it violates his First Amendment Rights and
8 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
9 journalistic sources' identities and communications secret.

10 39. Goodman objects to this request because it violates his First Amendment Rights and
11 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
12 journalistic sources' identities and communications secret.

13 40. Goodman objects to this request because it violates his First Amendment Rights and
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
15 journalistic sources' identities and communications secret.

16 41. Goodman objects to this request because it violates his First Amendment Rights and
17 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
18 journalistic sources' identities and communications secret.

19 42. Goodman objects to this request because it violates his First Amendment Rights and
20 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
21 journalistic sources' identities and communications secret.

1 43. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.

4 44. Goodman objects to this request because it violates his First Amendment Rights and
5 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
6 journalistic sources' identities and communications secret.

7 45. Goodman objects to this request because it violates his First Amendment Rights and
8 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
9 journalistic sources' identities and communications secret.

10 46. Goodman objects to this request because it violates his First Amendment Rights and
11 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
12 journalistic sources' identities and communications secret.

13 47. Goodman objects to this request because it violates his First Amendment Rights and
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
15 journalistic sources' identities and communications secret.

16 48. Goodman objects to this request because it violates his First Amendment Rights and
17 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
18 journalistic sources' identities and communications secret.

19 49. Goodman objects to this request because it violates his First Amendment Rights and
20 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
21 journalistic sources' identities and communications secret.

1 50. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.
4

5 51. Goodman objects to this request because it violates his First Amendment Rights and
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
7 journalistic sources' identities and communications secret.
8

9 52. Goodman objects to this request because it violates his First Amendment Rights and
10 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
11 journalistic sources' identities and communications secret.
12

13 53. Goodman objects to this request because it violates his First Amendment Rights and
14 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
15 journalistic sources' identities and communications secret.
16

17 54. Goodman objects to this request because it violates his First Amendment Rights and
18 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
19 journalistic sources' identities and communications secret.
20

21 55. Goodman objects to this request because it violates his First Amendment Rights and
22 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
23 journalistic sources' identities and communications secret.
24

25 56. Goodman objects to this request because it violates his First Amendment Rights and
26 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
27 journalistic sources' identities and communications secret.
28

1 57. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.
4

5 58. Goodman objects to this request because it violates his First Amendment Rights and
6 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
7 journalistic sources' identities and communications secret.
8

9 59. Goodman objects to this request because it is based on false claims from an
10 unidentified internet user and seeks irrelevant information that would serve no benefit
11 in resolving Plaintiff's claims. This request for production stands out from all others.
12 It is allegedly motivated by a public YouTube comment made by an unknown
13 individual using an account named "queentut". This is an account name any person
14 could select or obtain. YouTube presents no barriers in creating an account name or
15 multiple account names, even if that name already exists and is used by another user.
16 Any person could obtain the screen name "queentut" and could post any comment.
17 The statements made in the unattributed comment are false and unsupported by
18 evidence. The claims are insufficient to justify discovery of such irrelevant and
19 personal information. Plaintiff is requesting discovery of alleged naked photographs
20 of Defendant specifically displaying his penis. There is no conceivable explanation
21 to describe how such information would help resolve Plaintiff's claims. More than
22 any other single request, this speaks to Plaintiff's intention to obtain any information
23 whatsoever that could be used to harass, intimidate, embarrass or damage
24 Defendant's worldwide reputation.
25

26 60. See **(EXHIBIT B)**
27

28 DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY - 15

1 61. Goodman objects to this request because it specifically seeks personal information
2 about Goodman irrelevant to this matter intended to harass, intimidate, embarrass or
3 damage Defendant's worldwide reputation and unduly burden Defendant and would
4 not yield useful evidence in resolving this matter.
5

6 62. www.crowdsourcethetruth.org, www.crowdsourcethetruth.com

7 63. This is another request of particular interest. The now defunct YouTube channel
8 titled "Crazy Dave's Insane-a-torium" was dedicated to archiving videos created by
9 Intervenor Applicant D. George Sweigert. Sweigert regularly deletes his video posts,
10 effectively spoliating evidence from the internet. When Crazy Dave's Insane-a-
11 torium appeared, Intervenor Applicant moved swiftly to contact YouTube and
12 remove this channel for allegedly violating his copyright. More likely these steps
13 were taken to prevent the public from accessing evidence of Sweigert's ongoing
14 harassment campaign against Defendant and in support of Plaintiff. There was no
15 information about Plaintiff on Crazy Dave's Insane-a-torium making this a very
16 curious request, particularly given ongoing allegations of a clandestine conspiracy
17 between Plaintiff and Intervenor Applicant Sweigert. Goodman further objects to this
18 request because it violates his First Amendment Right to free speech and freedom of
19 the press. This violates New York Civil Rights Law - CVR -§ 79-h. Special
20 provisions relating to persons employed by, or connected with, news media which
21 protects Goodman's right to keep journalistic sources' identities and communications
22 secret.
23
24
25

1 64. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.

4 65. Goodman objects to this request because it violates his First Amendment Rights and
5 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
6 journalistic sources' identities and communications secret.

7 66. Goodman objects to this request because it violates his First Amendment Rights and
8 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
9 journalistic sources' identities and communications secret.

10 67. Goodman objects to this request as it is fundamentally unreasonable to presume
11 anyone could fulfill this. It would be virtually impossible to locate all tweets,
12 retweets, replies, likes, shares, comments, posts, blogs, photographs, videos,
13 messages or written content made by all the people using these services. This is an
14 unfulfillable request.

15 68. Goodman objects to this request as it is fundamentally unreasonable to presume
16 anyone could fulfill this. It would be virtually impossible to locate all tweets,
17 retweets, replies, likes, shares, comments, posts, blogs, photographs, videos,
18 messages or written content made by all the people using these services. This is an
19 unfulfillable request.

20 69. Goodman objects to this request because it violates his First Amendment Rights and
21 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
22 journalistic sources' identities and communications secret.

1 70. Goodman objects to this request because it violates his First Amendment Rights and
2 New York Civil Rights Law - CVR -§ 79-h. which protects Goodman's right to keep
3 journalistic sources' identities and communications secret.

4 71. Goodman objects to this request because it appears to be a trick question intended to
5 provoke a desired response to possibly be used against the defense. Goodman's
6 belief that Plaintiff committed charity fraud was based on Goodman's understanding
7 of the statutes related to operation of a 501c3 non-profit charitable corporations in
8 New York State as well as statements made and actions taken by Plaintiff in pursuit
9 of charitable donations. At no time prior to initiating this legal action did Plaintiff
10 take steps to clarify or provide expert testimony, letters demanding retraction or
11 providing supportive evidence to clarify the understanding of New York State statutes
12 related to the operation of a 501c3. Defendant's documents have already been
13 submitted in this ongoing legal matter; therefore, this is another request for
14 production of redundant material intended to waste Defendant's time and resources,
15 or otherwise cause the Defendant to make statements Plaintiff might twist to
16 Plaintiff's advantage.

17 72. Goodman objects to this request because it appears to be a trick question intended
18 to provoke a desired response or statement. The statement made in ECF 44 was made
19 on information and belief and the support for that belief is outlined in ECF 44. This
20 request is further evidence of Plaintiff's desire to request irrelevant information that
21 would not yield any useful evidence in resolving this matter

22 73. Goodman objects to this request because Goodman's specific allegation is that

23 Plaintiff, Intervenor Applicant and co-conspirators communicate using clandestine

1 methods akin to those used by CIA and Military Intelligence, with the specific intent
2 to hide evidence of such communication and defy civil legal procedures including
3 discovery. Good evidence of this cooperation can be seen in the common goals of the
4 individuals named and even in many of Plaintiff's requests for Production of
5 information that would only be useful to Intervenor Applicant. It is Defendant's
6 belief that Plaintiff's request is specifically intended to deceive or otherwise provoke
7 a statement from Defendant that would be used to discredit the allegation of
8 conspiracy.

9
10 74. Goodman objects to this request because it violates his First Amendment Rights and
11 New York Civil Rights Law - CVR -b 79-h. which protects Goodman's right to keep
12 journalistic sources' identities and communications secret.

13
14 75. Goodman objects to this request because it does not make sense and appears to be
15 impossible to fulfill.

CONCLUSION

Plaintiff's litany of false statements has enabled this fundamentally fraudulent lawsuit. It is Defendant's belief that this lawsuit and the Discovery process in question are intended to harass, intimidate and unduly burden Defendant while destroying Defendant's worldwide reputation. The information requested for production is remarkably broad and consistently unrelated to claims made by Plaintiff in the Amended Complaint. Requests for discovery of communications with talk show guests, confidential sources and virtually anyone of significance who has appeared on Goodman's show, reveal Plaintiff's apparent motive, to learn everything about anyone Defendant has communicated with and possibly expose those communications, destroying Defendant's worldwide reputation as a journalist. The Supreme Court has long mandated that trial courts should resolve civil matters fairly but without undue cost. *Brown Shoe Co. v. United States*, 370 U.S. 294, 306 (1962). This directive is echoed by the Federal Rules of Civil Procedure Rule 26(b)(2)(C), under which the court, "on its own, must" limit the frequency and extent of discovery if the discovery sought is "unreasonably cumulative or duplicative," can be "obtained from some other source that is more convenient, less burdensome, or less expensive,"

For this and the above stated reasons, Defendant respectfully requests the court stay discovery in this matter. Respectfully submitted,

Jason Goodman, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001

truth@crowdsourcethetruth.org

(EXHIBIT A)

**D. George Sweigert, c/o
P.O. Box 152
Mesa, AZ 85211**

May 16, 2019

**Hon. Mark Esper
Secretary of the Army
Office of the Secretary of the Army
101 Army Pentagon
Washington, DC 20310-0101**

**REF: Inappropriate access to sensitive unclassified information by retired General
 William F. Kerman**

Good Morning,

1. As you are well aware, the referenced military member has been allegedly making inappropriate contacts to a military organization on behalf of the individual that closed the Port of Charleston, S.C. due to a dirty bomb hoax on June 14, 2017. A video confession is referenced below.

2. This military member began corresponding with an individual known as "Queen Tut" aka Susan Holmes of Fort Collins, Colorado. Ms. Holmes is infamously known for holding a "KILL ALL POLICE" sign at a protest at the Colorado State University (see below). Her side-kick, Jason D. Goodman (DOB April 7, 1970), has widely disseminated a telephone call with this military member, in which he states he made inquiries to SACLANT on behalf of "Queen Tut" and Mr. Goodman. Mr. Goodman is widely attributed as the individual that closed the Port of Charleston.

Warm regards,


D. Sweigert

Copies provided:

**Commanding General
U.S. Army Criminal
Investigative Command
27130 Telegraph Road,
Quantico, VA 22134-2253**

**Susan Homes,
aka Susan A. Lutzke
2608 Leisure Drive
Apt. B
Fort Collins, CO 80525**

**Sir Ian Forbes, ADM
Commander In Chief (CINC)
SACLANT
7857 Blandy Road,
Suite 100
Norfolk, Virginia 23551-2490**

**Jason Goodman
252 7th Avenue
Suite 6-S
New York, NY 10001**

**Chief of Police
Colorado State
University
Green Hall
Fort Collins, CO 80521**

**Sector Commander,
Capt. Jason Tama,
USCG
USCG Sector New York
212 Coast Guard Drive
Staten Island, N.Y. 10305**

Evidence

Internet URL: <https://money.cnn.com/2017/06/16/media/port-of-charleston-dirty-bomb-conspiracy-theory-shutdown/index.html>

CNN BUSINESS Markets Tech Media Business Perspectives Video

How a conspiracy theory closed part of a major US seaport

by Donie O'Sullivan @CNNMoney

June 16, 2017 5:46 PM ET



The past few years have shown how our propensity to speculate and to share online can quickly transform a fringe thought into conventional thinking. On Wednesday, we got new evidence of the

RELIABLE SOURCES

Brian Stelter's must-read media newsletter

Click to subscribe >



[Photos] Ali MacGraw Is Almost 80. Try Not To Smile When You...

25 Faded

Webb posts daily on his own, separate YouTube channel, hosting a series he calls "Hillary's Leakers, Hackers and Henchmen." His videos rarely get more than 10,000 YouTube views.

New

After Webb mentioned the "Memphis Maersk," the audience quickly sprung into collective action through a "Crowdsolve the Truth" Facebook group and the live comments section that accompanied the YouTube broadcast.

An In
Until

Using a free online tracking tool, viewers found that the ship was in or approaching the Port of Charleston in South Carolina.

The 1
Card:

About an hour later, Webb's onscreen counterpart, Jason Goodman, who runs "Crowdsolve the Truth," called a number he said was the Coast Guard while still live streaming.



Goodman identified himself to the person on the other end of the line as a "reporter with an independent news agency," and began telling them about the alleged threat before he was interrupted.



"Is this the 'dirty bomb?'" the person asked — someone had already called it in — perhaps someone watching the live stream.



Internet URL: <https://www.youtube.com/watch?v=aUeNLLWikiM&t=14s>



Retired US Army Four Star General William F. Kerman Destroys Robert David Steele's Ridiculous Claims

Jason Goodman

✓ Subscribed 81K

8,031 views

+ Add to Share ... More

167 345 22

Streamed live on May 1, 2019

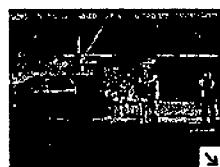
Robert David Steele has boasted of "writing 85%" of the NATO Open Source Intelligence Handbook. However, the retired Four Star U.S. Army General who oversaw the project at SACLANT says Robert David Steele's claim is not only false, but ridiculous.

Internet URL: <https://www.coloradoan.com/story/news/2018/12/22/mother-man-fatally-shot-fort-collins-csu-police-files-complaint-complete-body-cam-footage/2391338002/>

Mother of man killed by police files court complaint for unredacted body camera footage

Seja Hindi, Fort Collins Coloradan

Published 12:44 p.m. MT Dec. 22, 2018 | Updated 12:56 p.m. MT Dec. 23, 2018



The mother of a man fatally shot by police last year filed a complaint in district court this month asking Colorado State University to release unredacted footage of her son's shooting.

(Photo: Cassa Neddringhaus/The Coloradoan, Cassa Neddringhaus/The Coloradoan)

An attorney filed the civil action for Susan Holmes. Her 19-year-old son, Jeremy, was shot by a Fort Collins police officer and a Colorado State University police officer during a confrontation on July 1, 2017.

Susan Holmes had called police dispatch to report that Jeremy, who she said was having a psychotic reaction to THC from marijuana, had left the house with a knife and had threatened to kill his brother. She couldn't reach her other son or his wife by phone and asked for police to be dispatched to where they lived about two miles away and tell them not to answer the door.

A CSU police officer, Katie Aron, responded to the apartment, since it was located on campus, but another CSU officer, Corporal Phil Morris, made contact with Jeremy Holmes nearby between Center Avenue and Whitcomb Street.

ADVERTISEMENT

SEE MORE STORIES



1 killed in plane crash near airport in Loveland

May 16, 2019, 9:11 p.m.

General:

Thank you very much for your efforts in resolving this issue. I really appreciate it. Your information will save a lot people from supporting a fraud being perpetuated by Robert David Steele.

Sincerely,

QUEENTUT

21 Aug 2017 18:29 by GENERALKERNAN@XXXXXXXXXX.com

QUEENTUT:

I have checked several sources and Robert David Steele never worked for us at NATO or JFCOM when we published this handbook. This handbook was a product of SACLANT Strategy and Plans and championed by a Dutch Rear Admiral. This was definitely a staff effort.

I have no idea why this individual would list this as one of his publications when it is clearly a NATO publication.

Hope this is helpful..

Buck Kerman

In a message dated 8/17/2017 6:49:25 PM Eastern Standard Time, QUEENTUT@XXXXXXXXXX.com writes:

Hi General Kernan:

This is QUEENTUT here.

(EXHIBIT B)

Jason Goodman
Director, Cinematographer, Stereographer
252 7th Avenue New York, NY 10001 212-844-9830

Education 1990–1994

Graduated NYU Tisch School of the Arts BFA Film and Television Production

Work Experience

Carolco Pictures 2014–2016 (Executive Board Member)

Charter member of the Board of Directors of the newly restored multibillion dollar brand.

AeroCine, INC 2013–2014 (CEO)

Founding member of this UAS cinematography company. First in the world to conduct 3D RED UAV flight.

21st Century 3D 1999–present (Founder and CEO)

Founded the first digital stereoscopic live action production company in New York City. Developed cutting edge stereoscopic camera systems. Expanded to offices in both New York and Los Angeles in 2009.

Multimedia System Design 1993–1999 (Founder and CEO)

IT support company catering to video editors, graphic arts and musicians. Deployed and maintained networks for many ad agencies and video production facilities.

Crest Films 1991–1993 (IT Administrator)

Worked directly with filmmaker / CEO Pierre DeLespinois deploying and managing computer systems and networks for the emerging digital production environment at this innovative, technology centric film production company.

Production Credits

Director

1. Fantasma VR (2016) 3D 360° tour of NYC's Houdini Museum of Magic
2. Daydreams of Dubai (2014) 3D Filmation (ride film for UAE) (Writer/Director/DoP)
3. Vancril VR (1997) Cutting edge virtual experience created for Wyeth Pharmaceuticals

Cinematographer

1. Houston Rockets VR experience 3D (2017) (director of photography/stereographer)
2. Marriott / Oculus VR experience 3D (2014) (director of photography/stereographer)
3. Skyhigh Scrappers 3D (2013) Discovery UK (director of photography/stereographer)
4. Sully Erna: Avalon Live (2012) (director of photography/stereographer)
5. Slightly Stoopid & Fishbone Live (2011) (director of photography/stereographer)
6. Hillbilly Blood (2011) (TV series) 3net (director of photography/stereographer)
7. Julia X (2010) (director of photography/stereographer)

Camera and Electrical Department

1. X-Men: Days of Future Past (2014) (stereographer: VFX elements unit)
2. Metallica Through the Never (2013) (stereographer: NY unit / Post Stereo Supervisor)
3. The Amazing Spier-Man (2012) (stereographer: second unit)
4. Air Racers IMAX 3D (2012) (stereographer)
4. I (Almost) Got Away With It (2011) (stereographer – 1 episode)
5. Kenny Chesney: Summer in 3D (2010) (second unit stereographer)
6. Planet You 3D (2009) (stereographer)
7. Call of the Wild (2009) (stereographer)

Circuit Court for Eastern Division VirginiaCase No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Network

Name				
11005 LANGTON ARMS CT				
Street Address	Apt. #			
OAKTON, VA 22124	(571)	320-8573		
City	State	Zip Code	Area Code	Telephone

VS.

Jason Goodman

Name				
252 7th avenue	6s			
Street Address	Apt. #			
New York	NY	10001	(323)	744-7594
City	State	Zip Code	Area Code	Telephone

Plaintiff

Defendant

CERTIFICATE OF SERVICE (DOMREL58)

I HEREBY CERTIFY that on this 28 day of May, 2019, a copy of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY

Title of Document(s)
was/were mailed, postage prepaid to:

D. George Sweigert

Opposing Party or His/Her Attorney

PO Box 152

Address

City	Mesa	AZ	85211	State	Zip
------	------	----	-------	-------	-----

May 28, 2019
Date

Signature



Circuit Court for <u>Eastern Division Virginia</u>					Case No. <u>3:17-cv-601-MHL</u>																																																											
<u>City or County</u>																																																																
Robert David Steele and Earth Intelligence Network																																																																
<table border="0"> <tr> <td>Name</td> <td colspan="4">Jason Goodman</td> </tr> <tr> <td>11005 LANGTON ARMS CT</td> <td colspan="4"></td> </tr> <tr> <td>Street Address</td> <td colspan="4" style="text-align: right;">6s</td> </tr> <tr> <td>OAKTON,</td> <td>VA</td> <td>22124</td> <td>Apt #</td> <td></td> </tr> <tr> <td colspan="5">(571) 320-8573</td> </tr> <tr> <td>City</td> <td>State</td> <td>Zip Code</td> <td>Area Code</td> <td>Telephone</td> </tr> </table>					Name	Jason Goodman				11005 LANGTON ARMS CT					Street Address	6s				OAKTON,	VA	22124	Apt #		(571) 320-8573					City	State	Zip Code	Area Code	Telephone	<table border="0"> <tr> <td>Name</td> <td colspan="4">VS.</td> </tr> <tr> <td>252 7th avenue</td> <td colspan="4"></td> </tr> <tr> <td>Street Address</td> <td colspan="4" style="text-align: right;">Apt #</td> </tr> <tr> <td>New York</td> <td>NY</td> <td>10001</td> <td>(323)</td> <td>744-7594</td> </tr> <tr> <td>City</td> <td>State</td> <td>Zip Code</td> <td>Area Code</td> <td>Telephone</td> </tr> </table>					Name	VS.				252 7th avenue					Street Address	Apt #				New York	NY	10001	(323)	744-7594	City	State	Zip Code	Area Code	Telephone
Name	Jason Goodman																																																															
11005 LANGTON ARMS CT																																																																
Street Address	6s																																																															
OAKTON,	VA	22124	Apt #																																																													
(571) 320-8573																																																																
City	State	Zip Code	Area Code	Telephone																																																												
Name	VS.																																																															
252 7th avenue																																																																
Street Address	Apt #																																																															
New York	NY	10001	(323)	744-7594																																																												
City	State	Zip Code	Area Code	Telephone																																																												
Plaintiff					Defendant																																																											

CERTIFICATE OF SERVICE
(DOMREL58)

I HEREBY CERTIFY that on this 28 day of May, 2019, a copy of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY

Title of Document(s)
 was/were mailed, postage prepaid to:

Susan Lutzke Holmes

Opposing Party or His/Her Attorney

2608 Leisure Dr Unit B

Address

Fort Collins CO 80525
City State Zip

May 28, 2019
Date

Signature



Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Network

Name				
11005 LANGTON ARMS CT				
Street Address	Apt.#			
OAKTON, VA 22124	(571)	320-8573		
City	State	Zip Code	Area Code	Telephone

VS.

Jason Goodman

Name				
252 7th avenue	6s			
Street Address	Apt.#			
New York	NY	10001	(323)	744-7594
City	State	Zip Code	Area Code	Telephone

Plaintiff

Defendant

CERTIFICATE OF SERVICE

(DOMREL58)

I HEREBY CERTIFY that on this 28 day of May, 2019, a copy of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY

Title of Document(s)
was/were mailed, postage prepaid to:

Terry Frank Kaufman & Canoles

Opposing Party or His/Her Attorney

1021 E. Cary Street, 14th Floor

Address

Richmond	VA	23219
City	State	Zip

May 28, 2019

Date

Signature



Circuit Court for <u>Eastern Division Virginia</u>					Case No. <u>3:17-cv-601-MHL</u>				
City or County									
Robert David Steele and Earth Intelligence Network									
Name <u>11005 LANGTON ARMS CT</u> Street Address <u>OAKTON, VA 22124</u> Apt. # <u>(571) 320-8573</u> City <u>State</u> <u>Zip Code</u> <u>Area Code</u> <u>Telephone</u>					VS. Jason Goodman Name <u>252 7th avenue</u> 6s Street Address <u>New York</u> Apt. # <u>NY 10001 (323) 744-7594</u> City <u>State</u> <u>Zip Code</u> <u>Area Code</u> <u>Telephone</u>				
Plaintiff					Defendant				

CERTIFICATE OF SERVICE
(DOMREL58)

I HEREBY CERTIFY that on this 28 day of May, 2019, a copy of the document(s) entitled DEFENDANT'S RESPONSE TO PLAINTIFF, ROBERT DAVID STEELE'S, FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND MOTION TO STAY DISCOVERY

Title of Document(s)
 was/were mailed, postage prepaid to:

Steven S Biss

Opposing Party or His/Her Attorney

300 West Main Street Suite 102

Address

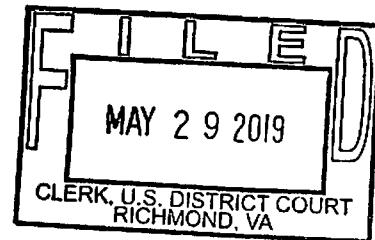
Charlottesville VA 22903
City State Zip

May 28, 2019
 Date

Signature



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
DIVISION



ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOODMAN, et al.,

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of

DEFENDANT'S RESPONSE TO PLAINTIFF,
ROBERT DAVID STEELE'S,
FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS AND MOTION TO STAY
DISCOVERY

JASON GOODMAN

Name of *Pro Se* Party (Print or Type)



Signature of *Pro Se* Party

Executed on: May 28, 2019 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type))

Signature of *Pro Se* Party

Executed on: _____ (Date)